

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
HECTOR FITZGERALD TYNDALL : CHAPTER 13
Debtor. :

DEUTSCHE BANK NATIONAL TRUST :
COMPANY, AS TRUSTEE FOR FIRST :
FRANKLIN MORTGAGE LOAN :
TRUST 2006-FF13, MORTGAGE PASS :
THROUGH CERTIFICATES SERIES :
2006-FF13 :

Movant, :

vs. :

HECTOR FITZGERALD TYNDALL : CASE NO. 5-15-02345
Respondents. :

**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362**

AND NOW COMES, Hector Tyndall, the Debtor, and files an Answer to Deutsche Bank's
Motion for Relief From the Automatic Stay:

1. Hector Tyndall (hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding
with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.

2. Movant alleges that Debtor has failed to maintain insurance on the property and pay
the yearly real estate taxes.

3. Debtor did fall behind on the real estate taxes. Debtor requests that the advance for
the escrow be placed in an amended Chapter 13 Plan.

4. Movant is not entitled to relief from the automatic stay as the arrearage amount due
has been paid or shall be paid through the Chapter 13 Plan, and/or a six (6) month Stipulation, and,

therefore, the Movant is adequately protected.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: October 14, 2018

/s/Tullio DeLuca
Tullio DeLuca, Esquire
PA ID# 59887
381 N. 9th Avenue
Scranton, PA 18504
(570) 347-7764

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 14, 2018, he caused a true and correct copy
of Debtor's Answer to Deutsche Bank's Motion for Relief from the Automatic Stay to be served
Via First Class United States Mail, Postage Pre-paid in the above-referenced case, on the following:

Charles J. DeHart, III, Esq. at dehartstaff@ramapo.com

Brian Caine, Esq. at bcaine@parkermccay.com

Dated: October 14, 2018

/s/Tullio DeLuca
Tullio DeLuca, Esquire